

STATEMENT OF BASIS (AI No. 32349)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0112925 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: C-Port, L.L.C.
C-Port 2, L.L.C.
106 9th Street, Lot 1
Fourchon, Louisiana 70357

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Michelle Bickham

DATE PREPARED: November 29, 2006

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - N/A
NPDES permit effective date: N/A
NPDES permit expiration date: N/A

C. LPDES permit - (LA0112925)
LPDES permit effective date: April 1, 2002
LPDES permit expiration date: March 31, 2007

D. Date Application Received: September 20, 2006

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - oilfield service company and terminal

C-Port, L.L.C., C-Port 2, L.L.C. is an existing facility that loads and offloads materials from oil supply vessels. Materials include but are not limited to pumps, valves, fittings, cables, anchors, groceries, palletized dry bulk materials (blasting sand and drilling mud additives), containerized lubricating oils, and ancillary materials. The majority of materials arrive by truck and are offloaded by C-Port personnel. The materials are loaded either directly onboard supply vessels or stored in the warehouse on site until loading operations can be performed. In addition to support operations, the facility also transfers potable water, diesel fuel and lubricating oil to maritime vessels.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC code: 1389, 5171

C. LOCATION - 180 1st Street, Fourchon, Lafourche Parish
Latitude 29°7'25", Longitude 90°12'5"

3. OUTFALL INFORMATION

Outfalls 001, 002, 003, and 004

These outfalls were previous stormwater outfalls. These outfalls are being removed from the permit based on a review of DMR's that indicated there were no excursions for the outfalls for the last two years. Stormwater will now be addressed in the Stormwater Pollution Prevention Plan (SWP3) language in this permit.

Outfall 005

Discharge Type: treated sanitary wastewater
Treatment: sewage treatment plant (aeration, chlorination)
Location: at the point of discharge from the sewage treatment
plants located on the north side of the facility
(Latitude 29°7'25", Longitude 90°12'5")
Flow: 20,000 gpd
Discharge Route: unnamed ditch thence to Bayou Lafourche

4. RECEIVING WATERS

STREAM - unnamed ditch and Bayou Lafourche

BASIN AND SEGMENT - Terrebonne Basin, Segment 020403

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
e. oyster propagation

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

Summary of Proposed Changes From the Current LPDES Permit:

1. Outfalls 001, 002, 003, and 004 have been removed from the permit.
See Outfall Information.
2. The fecal limits for Outfall 005 have been changed to 14 col/100 mL (monthly average) and 43 col/100 mL (daily max).

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

The most current inspection of the facility was conducted on September 29, 2005 as a result of Hurricane Katrina and Hurricane Rita. The assessment stated there was no environmental impact or damage reported by the facility as a result of these hurricanes.

B. DMR Review/Excursions

A DMR review was conducted for the last two years. All DMR's were reported in accordance with the current permit and no excursions were noted.

7. EXISTING EFFLUENT LIMITS

Outfalls 001, 002, 003, and 004 - stormwater runoff

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow - gpd	Report 1/3 mos Est.	Report 1/3 mos Est.
TOC	---	50 mg/L 1/3 mos Grab
Oil & Grease	---	15 mg/L 1/3 mos Grab
pH	6.0 - 9.0 s.u. 1/3 mos Grab	

Outfall 005 - treated sanitary wastewater

Parameter	LPDES	
	Monthly Average	Weekly Average
Flow - gpd	Report 1/3 mos Est.	Report 1/3 mos Est.
BOD ₅	30 mg/L 1/3 mos Grab	45 mg/L 1/3 mos Grab
TSS	30 mg/L 1/3 mos Grab	45 mg/L 1/3 mos Grab
Fecal Coliform col/100 ml	200/100 ml 1/3 mos Grab	400/100 ml 1/3 mos Grab
pH	6.0 - 9.0 s.u. 1/6 mos Grab	

8. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 020403 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006, from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in

Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Rationale for C-Port, L.L.C.

1. **Outfall 005 - treated sanitary wastewater** (estimated flow is 20,000 gpd)

<u>Pollutant</u>	<u>Limitation</u>	<u>Reference</u>
	Mo. Avg:Weekly Avg. (mg/l)	

Flow	Report:Report	LAG540000*
BOD	30:45	LAG540000*
TSS	30:45	LAG540000*
Fecal Coliform	14:43 (col/100 mL)	LAG540000*
pH	6.0 - 9.0 s.u.	LAG540000*

Treatment: sewage treatment plant (aeration, chlorination)

Monitoring Frequency: quarterly at the point of discharge from the sewage treatment plants located on the north side of the facility

Limits Justification: LAG540000 and the existing permit. Please note that the limits for fecal coliform have been set at monthly average, 14 col/100 mL, and weekly average, 43 col/100 mL, because this outfall discharges into a waterbody designated for oyster propagation.

* Existing permits for similar outfalls
BPJ Best Professional Judgement
su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

TMDL/303(d) LANGUAGE

Subsegment 020403 is listed on LDEQ's Final 2004 303(d) List as impaired for fecal coliform. To date no TMDL's have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirements of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDL's for the Terrebonne Basin, those suspected causes for impairment which are not directly attributed to the oilfield service company and terminal point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause or have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

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Therefore, for the purposes of this permit, the fecal coliform impairment will be addressed in a manner consistent with the Department's permitting guidance for implementing Louisiana's surface water quality standards as follows:

Fecal Coliform

To protect against the further impairment of the fecal coliform impairment cause, a fecal coliform limit has been placed on Outfall 005.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

The SIC codes for this facility are 1389. Stormwater from this site is defined under state regulations (LAC33:IX.2511.B.14) as stormwater associated with industrial activity. SWP3 language is included in the permit since there is a potential for storm water contamination from equipment storage outside.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility.